

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

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IN RE

Case No. 22-02969 ESL

CARLOS MANUEL SANTOS SERRANO  
xxx-xx-4625

Chapter 13

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MOTION TO FILE AMENDED SCHEDULE “J”

TO THE HONORABLE COURT:

Come now, debtor, Carlos Manuel Santos , through his undersigned attorney and respectfully avers and prays:

1. Debtor is filing amended Schedule “J”, dated April 30, 2023.
2. The amended Schedule “J” is filed to conform the expenses to the fact that debtor no longer receive the Social Security benefits until August 2023 and the new benefits will be lower in order to pay prior overcompensation due to debtor’s job at Firstbank.

WHEREFORE, Debtor moves this Honorable Court to take notice of Amended Schedule “J”, dated April 30 2023.

**NOTICE AND RESPONSE TIME  
TO ALL CREDITORS AND PARTIES IN INTEREST**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerks office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

CERTIFICATION OF NOTICE: That this motion is being send through CM/ECF which will notify through electronic mailing the following recipients:

MONSITA LECAROS ARRIBAS ustpreion21.hr.ecf@usdoj.gov

ROBERTO ROMAN VALENTIN  
romanchpt7@gmail.com, rroman@ecf.axosfs.com

ANDRES SAEZ-MARRERO on behalf of Creditor BMW Financial Services NA, LLC  
ecf@tmppllc.com, lcdo.andressaez@gmail.com

ALEJANDRO OLIVERAS RIVERA aorecf@ch13sju.com

ALEJANDRO OLIVERAS RIVERA (ENO) on behalf of Trustee ALEJANDRO OLIVERAS RIVERA aorecf@ch13sju.com

TERESA M LUBE CAPO on behalf of Creditor IRMA IVETTE MARTINEZ PEREZ  
lubaysoto@gmail.com, madelinesotopacheco@gmail.com;lubaysotoii@gmail.com

EDGAR ALBERTO VEGA RIVERA on behalf of Creditor BANCO POPULAR  
edvega@bppr.com, edgar.vega@popular.com

In Bayamón, Puerto Rico, this April 30, 2023.

/s/ Anibal Medina Rios  
USDCPR #125611  
Attorney for debtor  
Urb. Santa Cruz  
C23 Calle Marginal  
Bayamón, P.R. 00961-6706  
Tel: (787)460-6364  
[Email:medinalaw@gmail.com](mailto:medinalaw@gmail.com)

Label Matrix for local noticing  
0104-3  
Case 22-02969-ESL7  
District of Puerto Rico  
Old San Juan  
Tue May 2 09:12:27 AST 2023

BANCO POPULAR  
PO BOX 9023593  
SAN JUAN, PR 00902-3593

BMW Financial Services NA, LLC  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

UNITED STATES TRUSTEE  
500 TANCA ST STE 301  
SAN JUAN, PR 00901-1922

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

ANIBAL MEDINA RIOS  
URB SANTA CRUZ  
C-23 CALLE MARGINAL  
BAYAMON PR 00961-6706

ATTORNEY GENERAL USA  
DEPT OF JUSTICE  
MAIN BLDG 5111  
10th AND PENNSYLVANIA AVE NW  
WASHINGTON DC 20530-0001

BANCO POPULAR DE PUERTO RICO  
BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN PR 00936-6818

(p)BMW FINANCIAL SERVICES  
CUSTOMER SERVICE CENTER  
PO BOX 3608  
DUBLIN OH 43016-0306

BMW Financial Services Attn: Customer Accoun  
5550 Britton Parkway  
Hilliard, OH 43026-7456

BMW Financial Services NA, LLC  
c/o AIS Portfolio Services LLP  
4515 N. Santa Fe Ave.  
Oklahoma City, OK 73118-7901

CARLOS MANUEL SANTOS SERRANO  
Urb Country Club  
963 Calle Triguero  
San Juan, PR 00924-3339

CRIM  
PO Box 195387  
SAN JUAN PR 00919-5387

DEPARTMENT OF TREASURY  
BANKRUPTCY SECTION 424 B  
P.O. BOX 9024140  
SAN JUAN, PR 00902-4140

FIRST PREMIER BANK  
3820 N LOUISE AVE  
SIOUX FALLS SD 57107-0145

INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OP  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE (IRS  
CENTRALIZED INSOLVENCY OP  
POST OFFICE BOX 7317  
PHILADELPHIA PA 19101-7317

IRMA I MARTINEZ PEREZ  
PO BOX 1024  
DORADO PR 00646-1024

IRMA IVETTE MARTINEZ PEREZ  
PO BOX 1024  
DORADO, PR 00646-1024

ISLAND FINANCE LLC  
PO BOX BOX 71504  
SAN JUAN PR 00939-0001

(p)JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

JPMorgan Chase Bank, N.A.  
s/b/m/t Chase Bank USA, N.A.  
c/o Robertson, Anschutz, Schneid,  
Crane & Partners, PLLC  
6409 Congress Avenue, Suite 100  
Boca Raton, FL 33487-2853

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

LIGIA SANTOS TORRES  
PO BOX 6251  
CAGUAS PR 00726-6251

PMI Property Management  
2490 W Maple Loop Dr 304  
Lehi UT 84043

PR DEPT OF TREASURY  
BANKRUPTCY DIVISION 424-B OFFI  
PO BOX 9024140  
SAN JUAN PR 00902-4140

PROPERTY MANAGEMENT INC  
2901 W BLUE GRASS BLVD  
SUITE 420  
LEHI UT 84043-4244

Premier Bankcard, LLC  
Jefferson Capital Systems LLC Assignee  
Po Box 7999  
Saint Cloud MN 56302-7999

SECRETARIO HACIENDA PR  
PO BOX 90241090  
SAN JUAN PR 00902

SECRETARIO JUSTICIA PR  
PO BOX 9020192  
SAN JUAN PR 00902-0192

TOYOTA CREDIT DE PR  
PO BOX 9786  
CEDARS RAPIDS IA 52409-0004

Toyota Credit de Puerto Rico  
PO Box 9013  
Addison, Texas 75001-9013

ANIBAL MEDINA RIOS  
ANIBAL MEDINA RIOS LAW OFFICE  
C 23 CALLE MARGINAL  
URB SANTA CRUZ  
BAYAMON, PR 00961-6706

MONSITA LECAROS ARRIAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

ROBERTO ROMAN VALENTIN  
US TRUSTEES OFFICE  
PO BOX 9024003  
SAN JUAN, PR 00902-4003

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

BMW FINANCIAL SERVICES  
PO BOX 3608  
DUBLIN OH 43016

JPMCB CARD SERVICES  
PO BOX 15369  
WILMINGTON DE 19850

Jefferson Capital Systems LLC  
Po Box 7999  
Saint Cloud MN 56302-9617

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) BANCO POPULAR DOMINICANO  
APARTADO 1441 ZONA POSTAL 1  
SANTO DOMINGO REPUBLICA DOMINICANA

(u) CONSTRUCTORA EMPIRE SRL  
CALLE MIGUEL ANGEL MONCLUS #1  
MIRADOR NORTE  
DISTRITO NACIONAL  
SANTO DOMINGO, R.D. 1014

(d) CARLOS MANUEL SANTOS SERRANO  
URB COUNTRY CLUB  
963 CALLE TRIGUERO  
SAN JUAN, PR 00924-3339

(d) IRMA IVETTE MARTINEZ PEREZ  
PO BOX 1024  
DORADO, PR 00646-1024

End of Label Matrix  
Mailable recipients 34  
Bypassed recipients 4  
Total 38

**Fill in this information to identify your case:**

Debtor 1 CARLOS MANUEL SANTOS SERRANO  
 First Name Middle Name Last Name

Debtor 2  
 (Spouse, if filing) \_\_\_\_\_  
 First Name Middle Name Last Name

United States Bankruptcy Court for the: DISTRICT OF PUERTO RICO

Case number 22-02969 ESL  
 (if known)

Check if this is:

- ☒ An amended filing
- ☒ A supplement showing postpetition chapter 13 expenses as of the following date:  
04/30/2023  
 MM / DD / YYYY

**Official Form 106J****Schedule J: Your Expenses**

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach another sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

**Part 1: Describe Your Household****1. Is this a joint case?**

- ☒ No. Go to line 2.
- ☐ Yes. Does Debtor 2 live in a separate household?
- ☐ No
- ☐ Yes. Debtor 2 must file Official Form 106J-2, Expenses for Separate Household of Debtor 2.

**2. Do you have dependents?**

- ☐ No
- ☒ Yes. Fill out this information for each dependent.....

Do not list Debtor 1 and Debtor 2.

Do not state the dependents' names.

Dependent's relationship to Debtor 1 or Debtor 2	Dependent's age	Does dependent live with you?
<u>stepdaughter</u>		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
<u>stepson</u>		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
		<input type="checkbox"/> No <input type="checkbox"/> Yes
		<input type="checkbox"/> No <input type="checkbox"/> Yes
		<input type="checkbox"/> No <input type="checkbox"/> Yes
		<input type="checkbox"/> No <input type="checkbox"/> Yes

**3. Do your expenses include expenses of people other than yourself and your dependents?**

- ☐ No
- ☒ Yes

**Part 2: Estimate Your Ongoing Monthly Expenses**

Estimate your expenses as of your bankruptcy filing date unless you are using this form as a supplement in a Chapter 13 case to report expenses as of a date after the bankruptcy is filed. If this is a supplemental Schedule J, check the box at the top of the form and fill in the applicable date.

Include expenses paid for with non-cash government assistance if you know the value of such assistance and have included it on Schedule I: Your Income (Official Form 106I.)

**4. The rental or home ownership expenses for your residence.**  
 Include first mortgage payments and any rent for the ground or lot.

If not included in line 4:

- 4a. Real estate taxes
- 4b. Property, homeowner's, or renter's insurance
- 4c. Home maintenance, repair, and upkeep expenses
- 4d. Homeowner's association or condominium dues

**Your expenses**

4. \_\_\_\_\_

4a. \_\_\_\_\_

4b. \_\_\_\_\_

4c. \$50.00

4d. \_\_\_\_\_

Debtor 1 **CARLOS MANUEL SANTOS SERRANO**

Case number (if known) **22-02969 ESL**

	<u>Your expenses</u>
<b>5. Additional mortgage payments for your residence</b> , such as home equity loans	5. _____
<b>6. Utilities:</b>	
6a. Electricity, heat, natural gas	6a. <u>\$175.00</u>
6b. Water, sewer, garbage collection	6b. <u>\$53.64</u>
6c. Telephone, cell phone, Internet, satellite, and cable services	6c. <u>\$374.40</u>
6d. Other. Specify: _____	6d. _____
<b>7. Food and housekeeping supplies</b>	7. <u>\$779.00</u>
<b>8. Childcare and children's education costs</b>	8. _____
<b>9. Clothing, laundry, and dry cleaning</b>	9. <u>\$161.00</u>
<b>10. Personal care products and services</b>	10. <u>\$82.00</u>
<b>11. Medical and dental expenses</b>	11. <u>\$100.00</u>
<b>12. Transportation.</b> Include gas, maintenance, bus or train fare. Do not include car payments.	12. <u>\$315.00</u>
<b>13. Entertainment, clubs, recreation, newspapers, magazines, and books</b>	13. <u>\$200.00</u>
<b>14. Charitable contributions and religious donations</b>	14. _____
<b>15. Insurance.</b> Do not include insurance deducted from your pay or included in lines 4 or 20.	
15a. Life insurance	15a. _____
15b. Health insurance	15b. <u>\$169.00</u>
15c. Vehicle insurance	15c. _____
15d. Other insurance. Specify: _____	15d. _____
<b>16. Taxes.</b> Do not include taxes deducted from your pay or included in lines 4 or 20. Specify: _____	16. _____
<b>17. Installment or lease payments:</b>	
17a. Car payments for Vehicle 1 <b>Toyota 2021</b>	17a. <u>\$584.00</u>
17b. Car payments for Vehicle 2 <b>Susuki (Dominican Rep)</b>	17b. <u>\$235.59</u>
17c. Other. Specify: _____	17c. _____
17d. Other. Specify: _____	17d. _____
<b>18. Your payments of alimony, maintenance, and support that you did not report as deducted from your pay on line 5, Schedule I, Your Income (Official Form 106I).</b> <b>Support payment ex-spouse</b>	18. <u>\$3,500.00</u>
<b>19. Other payments you make to support others who do not live with you.</b> Specify: <u>Expenses at D.R. See Other Exp</u>	19. _____
<b>20. Other real property expenses not included in lines 4 or 5 of this form or on Schedule I: Your Income.</b>	
20a. Mortgages on other property	20a. _____
20b. Real estate taxes	20b. _____
20c. Property, homeowner's, or renter's insurance	20c. _____
20d. Maintenance, repair, and upkeep expenses	20d. <u>\$154.82</u>
20e. Homeowner's association or condominium dues	20e. _____

Debtor 1 **CARLOS MANUEL SANTOS SERRANO**

Case number (if known) **22-02969 ESL**

21. Other. Specify: **See continuation sheet**

21. + **\$2,748.82**

22. Calculate your monthly expenses.

22a. Add lines 4 through 21.

22a. **\$9,682.27**

22b. Copy line 22 (monthly expenses for Debtor 2), if any, from Official Form 106J-2.

22b. \_\_\_\_\_

22c. Add line 22a and 22b. The result is your monthly expenses.

22c. **\$9,682.27**

23. Calculate your monthly net income.

23a. Copy line 12 (your combined monthly income) from Schedule I.

23a. **\$9,733.30**

23b. Copy your monthly expenses from line 22c above.

23b. - **\$9,682.27**

23c. Subtract your monthly expenses from your monthly income.  
The result is your monthly net income.

23c. **\$51.03**

24. Do you expect an increase or decrease in your expenses within the year after you file this form?

For example, do you expect to finish paying for your car loan within the year or do you expect your mortgage payment to increase or decrease because of a modification to the terms of your mortgage?

☐ No.

☒ Yes.

Explain here:

**Debtor estimates expenses will increase due to relocation of stepdaughter to Puerto Rico.**

Debtor 1 CARLOS MANUEL SANTOS SERRANO

Case number (if known) 22-02969 ESL

21. Other. Specify:

Health insurance (Dominican Republic) for stepson and stepdaughter	\$200.00
Books	
Child care (Dominican Republic)	\$300.00
Water, electric energy, wifi for minor at Dominican Republic	\$100.00
School Bus (Dominican Republic)	\$50.00
Mortgage Payment Dominican Republic	\$1,604.00
Home maintenance Dominican Republic	\$154.82
Miscellaneous	\$0.00
Saving/emergency reserve	
Insurance Susuki (Dominican Republic)	\$90.00
Travel expenses for debtor's spouse to visit daughter at Santo Domingo	\$250.00

Total:

\$2,748.82



UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

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IN RE

Case No. 22-02969 ESL

CARLOS MANUEL SANTOS SERRANO

Chapter 7

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DECLARATION CONCERNING DEBTOR'S AMENDED SCHEDULE "J"

I declare under penalty of perjury that I have read the foregoing Amended Schedule "J", dated April 30, 2023, consisting of 4 sheets, and they are true and correct to the best of my knowledge, information and belief.

Date: April 30, 2023

Signature: 

Carlos Manuel Santos Serrano